

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

THOMAS P. THRASH, individually and on  
behalf of himself and all others similarly  
situated,

07 Civ. 08665 (RWS)

Plaintiff,

v.

CUNN TUDOR LESSEE, L.P., a foreign  
limited partnership for profit, d/b/a Tudor  
Hotel at the United Nations, and DOES 1  
through 10 inclusive,

Defendants.

**NOTICE OF MOTION AND MOTION TO ADMIT**  
**ANANDA CHAUDHURI PRO HAC VICE**

PLEASE TAKE NOTICE that upon the annexed Affidavits in support of this motion and  
the Certificate of Good Standing annexed thereto, the undersigned will move this Court, before  
the Honorable Robert W. Sweet at the United States Courthouse for the Southern District of New  
York, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the  
Southern and Eastern Districts of New York, for an Order allowing the admission of Ananda  
Chaudhuri, a member of the law firm of Grant & Eisenhofer P.A., as an attorney *pro hac vice* to  
argue or try this case in whole or in part as counsel. Mr. Chaudhuri is a member in good  
standing of the Bar of the state of Delaware. There are no pending disciplinary proceedings  
against Mr. Chaudhuri in any state or federal court.

Dated: January 22, 2008

  
Keith M. Fleischman (KF 0199)  
GRANT & EISENHOFER P.A.  
485 Lexington Avenue, 29<sup>th</sup> Floor

638842 #25 1-22-08 MQ  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
JAN 22 2008 PM 2:38  
500 S. 6th St. N.Y.

New York, New York 10017

(646) 722-8500

(646) 722-8501 (Fax)

*Attorneys for Lead Plaintiffs RH Capital  
Associates LLC and Pacific Investment  
Management Company LLC and Co-Lead  
Counsel for the Putative Class*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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through 10 inclusive,

Defendants.

**AFFIDAVIT OF KEITH M. FLEISCHMAN IN SUPPORT OF  
MOTION TO ADMIT ANANDA CHAUDHURI *PRO HAC VICE***

STATE OF NEW YORK )  
                        )  
                        ) SS.  
COUNTY OF NEW YORK )

KEITH M. FLEISCHMAN, being duly sworn, hereby deposes and says as follows:

1. I am an attorney admitted to practice in the State of New York and the United States District Court for the Southern and Eastern District of New York. I am a director with the law firm, Grant & Eisenhofer P.A., counsel for Plaintiff Thomas P. Thrash, individually and on behalf of himself and all others similarly situated.

2. I make this Affidavit in support of the motion for admission *pro hac vice* of Ananda Chaudhuri to appear as counsel for plaintiff in this action.

3. Mr. Chaudhuri is an attorney of the law firm, Grant & Eisenhofer P.A. As evidenced by the Certificate of Good Standing annexed to his Affidavit (attached hereto as

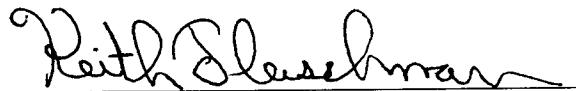
Exhibit 1), Mr. Chaudhuri is a member in good standing of the Bar of the state of Delaware

4. I know Ananda Chaudhuri to be of the finest moral character.

**WHEREFORE**, it is respectfully requested that the court grant the motion for an order permitting Ananda Chaudhuri to appear in this action as counsel for Plaintiff for all purposes *pro hac vice*. A proposed form of order is annexed hereto as Exhibit 2.

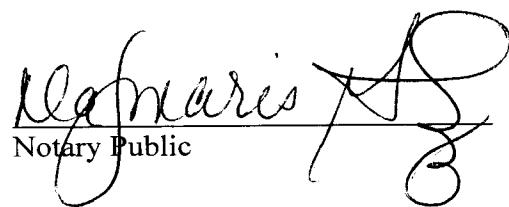
Dated: January 22, 2008

Respectfully submitted,



Keith M. Fleischman (KF 0199)  
GRANT & EISENHOFER P.A.  
485 Lexington Avenue, 29<sup>th</sup> Floor  
New York, New York 10017  
(646) 722-8500  
(646) 722-8501 (Fax)  
*Attorneys for Lead Plaintiffs RH Capital  
Associates LLC and Pacific Investment  
Management Company LLC and Co-Lead  
Counsel for the Putative Class*

Sworn to and subscribed before me  
this 22<sup>nd</sup> day of January 22, 2008.



Dagmaris G. Mendez  
Notary Public

DAGMARIS G. MENDEZ  
Notary Public, State of New York  
No. 01ME6137754  
Qualified in New York County  
Commission Expires December 5, 2009

# **EXHIBIT 1**

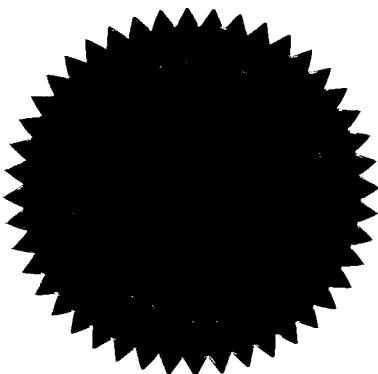
## SUPREME COURT OF THE STATE OF DELAWARE

### CERTIFICATE OF GOOD STANDING

The Clerk of the Supreme Court of the State of Delaware, the highest Court in the State, certifies that **Ananda Chaudhuri** was admitted to practice as an attorney in the Courts of this State on **June 21, 2006** and is an **active** member of the Bar of the Supreme Court of the State of Delaware in good standing.

### IN TESTIMONY WHEREOF,

I have hereunto set my hand and affixed the seal of said Court at Dover this 14th day of January 2008.



Cathy L. Howard

Cathy L. Howard  
Clerk of the Supreme Court

# **EXHIBIT 2**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THOMAS P. THRASH, individually and on  
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situated,

Plaintiff,

07 Civ. 08665 (RWS)

v.

CPUN TUDOR LESSEE, L.P., a foreign  
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through 10 inclusive,

Defendants.

**ORDER GRANTING  
MOTION TO ADMIT ANANDA CHAUDHURI *PRO HAC VICE***

The motion for admission to practice *pro hac vice* in the above-captioned matter is granted. The admitted attorney, Ananda Chaudhuri is permitted to argue and try this particular case in whole or in part as counsel or advocate.

An attorney admitted to practice *pro hac vice* is required to pay a \$25.00 attorney admission fee and present this Order to the intake deputy clerk in the Clerk's office. When paying by mail, return a copy of this Order to the Clerk's office with the required fee.

This Order confirms your appearance as counsel in this case, and it will be entered on the Court's docket. A notation of your admission *pro hac vice* for the above-captioned case will be made on the roll of attorneys.

The attorneys admitted *pro hac vice* must serve a copy of this Order on all other counsel in this case.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2008

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The Honorable Robert W. Sweet  
United States District Court Judge

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

THOMAS P. THRASH, individually and on  
behalf of himself and all others similarly  
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: 07 Civ. 08665 (RWS)

Plaintiff,

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limited partnership for profit, d/b/a/ Tudor  
Hotel at the United Nations, and DOES 1  
through 10 inclusive,

Defendants.

**AFFIDAVIT OF ANANDA CHAUDHURI**

Ananda Chaudhuri, being duly sworn, hereby deposes and says as follows:

1. I am an attorney with the law firm, Grant & Eisenhofer P.A.
2. I submit this Affidavit in support of the motion for my admission *pro hac vice* to appear as counsel for lead plaintiff in this action.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar of the state of Delaware
4. There are no pending disciplinary proceedings against me in any state or federal court.

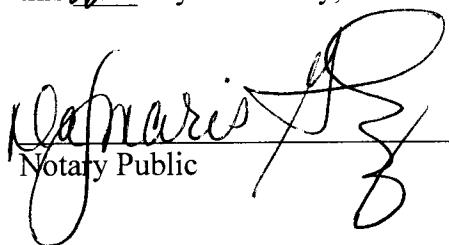
**WHEREFORE**, I respectfully submit that I be permitted to appear as counsel *pro hac vice* in this case.

Dated: January 22, 2008

Respectfully submitted,

  
\_\_\_\_\_  
Ananda Chaudhuri

Sworn to and subscribed before me  
this 2nd day of January, 2008.

  
\_\_\_\_\_  
Dagmaris G. Menendez  
Notary Public

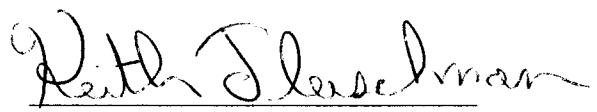
DAGMARIS G. MENDEZ  
Notary Public, State of New York  
No. 01ME6137754  
Qualified in New York County  
Commission Expires December 5, 2009

**CERTIFICATE OF SERVICE**

I hereby certify that on January 22, 2008, I caused the attached **Notice of Motion to Admit Ananda Chaudhuri Pro Hac Vice, Affidavit of Keith M. Fleischman** with attachments, **Proposed Order Granting the Motion to Admit Ananda Chaudhuri Pro Hac Vice** and this Certificate of Service to be filed with the Clerk of Court and to be served via overnight mail to the following counsel:

Scott M. Kobak  
Barry R. Ostrager  
Lisa Rubin (LR-4447)  
SIMPSON THACHER & BARTLETT LLP  
425 Lexington Avenue  
New York, NY 10017

*Attorney for Defendant CPUN Tudor Lessee LLP*

  
Keith M. Fleischman